

2021-2022

CITY OF EL PASO

HHSP POLICIES + PROCEDURES, 12TH ROUND

Homeless, Housing and Services Program (HHSP)



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EXECUTIVE SUMMARY

The purpose of this document is to notify interested parties as to the availability of Homeless, Housing and Services Program (HHSP) funds for services and programs within the City of El Paso for 2021-2022 Program Year. Additionally, it contains the policies and procedures pertaining to implementation of funds projected to be received by the City of El Paso from the Texas Department of Housing and Community Affairs (TDHCA). The Department of Community and Human Development (DCHD) oversees the planning, implementation and compliance of this funding on behalf of the City of El Paso.

The following table shows the 12th Round (2021-2022) HHSP funding projections:

Category	2020-2022 Allocation	2021-2022 Allocation	Projection
General	\$348,133	\$348,133*	Level funding
Youth Set-Aside	\$126,124	\$126,124*	Level funding

*12th Round allocations are projections, and are subject to change.

The City of El Paso has prioritized development of a vibrant regional economy, safe and beautiful neighborhoods and exceptional recreational, cultural and educational opportunities for El Pasoans. Those priorities have been adopted by the City Council in the form of the 25 by 2025 Strategic Plan. That plan identifies Goals, Actions and Tasks that make achievement of the City Vision possible. The Department of Community + Human Development through the careful administration of these funding sources, strives to enrich and enhance the performance of the following citywide strategic goals:

Goal 1: Create an Environment Conducive to Strong Sustainable Economic Development

Goal 2: Set the Standard for a Safe and Secure City

Goal 3: Promote the Visual Image of El Paso

Goal 4: Enhance El Paso's Quality of Life through Recreational, Cultural and Educational Environments

Goal 5: Promote Transparent and Consistent Communication Amongst All Members of the Community

Goal 6: Set the Standard for Sound Governance and Fiscal Management

Goal 7: Enhance and Sustain El Paso's Infrastructure Network

Goal 8: Nurture and Promote a Healthy, Sustainable Community

Applicants pursuing funding through the sources included in this document should confirm eligibility with federal requirements and illustrate alignment with identified city strategic goals. Details of the City Strategic Plan can be found at elpasotexas.gov/community-information/strategic-planning.

ACRONYMS + DEFINITIONS

Acronyms

- **ADA** – Americans with Disabilities Act
- **CoC** – Continuum of Care
- **DCHD** – Department of Community and Human Development
- **FY** – Fiscal Year
- **HHSP** – Homeless Housing and Services Program

- **HMIS** – Homeless Management Information System
- **NOFA** – Notice of Funding Availability
- **PY** – Program Year
- **TARP** – Technical Advisory Review Panel
- **TDHCA** - Texas Department of Housing and Community Affairs

Definitions

- **Government entity** – means any branch, department, agency, or instrumentality of state government, or any official or other person acting under color of state law (e.g., school districts, public housing authority).
- **Recipient** – the City of El Paso DCHD who receives funds directly from TDHCA through an executed grant agreement.
- **Sub-recipient agency** – agencies that receive funding from the Recipient (DCHD) and provides direct client services.

DEPARTMENT OF COMMUNITY + HUMAN DEVELOPMENT

The Department of Community + Human Development (DCHD) of the City of El Paso acts as the grantee for funding received from the Department of Community and Housing Development. The role of DCHD staff is to administer the specific allocation of funding to sub-recipients as well as to execute and oversee compliance with federal and state regulations and the policies and procedures included in this document. Funding allocations are projections only and can be modified at the discretion of the Director of DCHD, provided that such modifications do not represent a significant change in allocation priorities and/or method of distribution. Additionally, the Director of DCHD may grant exceptions to policies and procedures contained within this document provided that those exceptions do not violate federal or state regulations and are made for each program year prior to presentation of the HHSP Funding Recommendation to City Council.

HHSP OVERVIEW

In accordance with Tex. Government Code §2306.2585, HHSP provides funding to municipalities with populations of 285,500 or greater to develop programs to prevent and eliminate Homelessness. The City of El Paso is projected to receive HHSP funds under General and Youth Set-Aside Components.

HHSP OBJECTIVES

General. The local objectives for HHSP General funding are to:

1. Prevent at-risk families and Individuals from becoming homeless;
2. Rapidly re-house individuals and families who are experiencing homelessness;
3. Provide case management to ensure successful outcomes.

Youth Set-Aside. The local objectives for HHSP Youth Set Aside funding are to:

1. Provide case management to eligible youth (Ages 18 to 24) in transitional housing;
2. Provide transitional housing for youth (Ages 18 to 24) and youth who have aged out of foster care;
3. Provide essential services to youth (Ages 18 to 24) in transitional housing.

FEDERAL, STATE + LOCAL REQUIREMENTS

Organizations who apply for funding must meet all applicable federal, state and local eligibility requirements. Federal requirements are determined by HUD. Local guidelines are developed by DCHD staff and approved by City Council.

FEDERAL + STATE REQUIREMENTS

- **ADA and Historic Preservation.** Applicant must comply with all City Codes, including City, State and Federal Americans with Disabilities Act (ADA) and historic preservation requirements.
- **Authority to Apply.** Written minute action and/or Board approval documentation signed by the Board President authorizing submittal and signature of the application by Board President (or other authorized representative) must be submitted with the application.
- **Authorized Signatory.** Approved documentation (e.g., minute action or letter from the Board) certifying whom from the applicant's organization is the authorized signatory who can sign contracts on behalf of the agency.
- **DUNS Number.** Applicants are required to submit the DUNS Number in order for DCHD staff to verify on the System of Award Management (SAM) website that the agency is clear of debarment from receiving federal funds. If considered for funding DCHD staff will verify compliance with this requirement prior to execution of any contract .
- **Fair Housing Act** - Applicant must comply with the Fair Housing Act, Executive Order 11063 (Equal Opportunity in Housing), the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and Executive Order 11246 (Equal Employment Opportunity). Agencies operating programs/services in DCHD-funded facilities, as applicable, will be required to develop and implement Affirmative Marketing policies and procedures, and shall assure housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- **Faith-Based Organizations** - Faith-based organizations that are applying for funding must comply with HUD's Final Rule that became effective October 30, 2003, as amended. Refer to Attachment J of this document.
- **Households Served.** Applicants are required to provide the number of household served for each program or project that is awarded funding. Data collection on race, ethnicity, and age will be used to facilitate analysis of racial disparities among people experiencing homelessness. Such an analysis is a critical first step in identifying and changing racial and ethnic bias in our systems and services.
- **Lobbying** - Under section 1352, title 31, U.S. Code, no Federal appropriated funds may be paid or have been paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with Federal contract, grant, loan, or cooperative agreement, the applicant must complete and submit Standard Form-ILL, "Disclosure Form to Report Lobbying".
- **Persons Served.** Applicants are required to provide the number of persons served for each program or project that is awarded funding. Data collection on race, ethnicity, and age will be used to facilitate analysis of racial disparities among people experiencing homelessness. Such an analysis is a critical first step in identifying and changing racial and ethnic bias in our systems and services.
- **Procurement Guidelines.** Applicants must follow federal procurement rules, along with all applicable state and local requirements, when purchasing services, supplies, materials, or equipment with DCHD-awarded funding.

Below is a summary of the most current federal procurement methods. Applicable federal regulations are contained in 2 CFR Part §200.320 Uniform Administrative Requirements.

- **Sealed bids (formal advertising).** This procedure should be used for all construction contracts or for goods costing more than \$100,000. Competitive sealed bidding requires publicly solicited sealed bids and a firm-fixed-price lump sum or unit price contract is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is lowest in price. The following requirements apply when this method of procurement is used:
 - **Publication Period:** The invitation for bids must be publicly advertised and bids solicited from an adequate number of suppliers. The publication should be published at least once in a newspaper of general circulation, providing sufficient time prior to bid opening. If the publication period is not of sufficient time to attract adequate competition, the bid may have to be re-advertised.
 - **Clear Definition:** The invitation for bids, including specifications and pertinent attachments, must clearly define the items or services needed in order for bidders to properly respond to the invitation.
 - **Public Opening:** All bids must be opened publicly at the time and place stated in the invitation for bids. The public is allowed at that time to review the bids.
 - **Selection and Contracting:** A firm-fixed-price contract award must be made by written notice to the responsible bidder whose bid, conforming to the invitation for bids, is lowest. Where specified in the bidding documents, factors such as discounts, transportation costs and life cycle costs must be considered in determining which bid is lowest.
 - **Rejection of all Bids:** All bids may be rejected when sound documented reasons exist. Such documentation shall be made a part of the files.
 - adequate number of qualified sources.
- **Competitive proposals.** This procedure is used to purchase professional services where the total cost will exceed \$100,000. Under this procurement method, the applicant must publish a written request for submissions and then review these submissions based on established selection criteria; and the applicant must solicit proposals from an adequate number of qualified sources. There are two possible methods of soliciting proposals – a request for proposals (RFP) or a request for qualifications (RFQ). The following requirements apply when this method of procurement is used:
 - **Publication Period:** Proposals must be solicited from an adequate number of qualified sources and an advertisement must be published. RFPs/RFQs should be published in a sufficient timeframe before the proposals/qualifications are due.
 - **Clear Definition:** The RFP/RFQ must identify the general scope of work and all significant factors of evaluation, including price where appropriate, and their relative importance.
 - **Technical Evaluation:** The grantee must provide a mechanism for technical evaluation of the proposals received, determinations of responsible offeror and the selection for contract award.
 - **Award:** Award may be made to the responsible offeror whose proposal will be most advantageous to the procuring party, price and other factors considered. Unsuccessful offerors should be notified promptly. The contract can be either a fixed price or a cost reimbursement type.
- **Verification of non-profit status.** Non-profit agencies must submit the Internal Revenue Service (IRS) letter certifying their 501(c) (3) status and the completed and signed Assurance of Applicant Eligibility for Non-Profit Organizations on page. Refer to Assurance B of this document.

LOCAL REQUIREMENTS

- **Acceptance of Grant Conditions and Terms.** Applicant must submit with their application an Acceptance of Grant Conditions and Terms form signed by an authorized representative of the applicant. Refer to Assurance A of this document.
- **Administrative Capacity.** Applicant must have demonstrated administrative and financial capacity to fully operate the project. A certified audit, covering a period ending on a date after January 31, 2020 must be submitted. This requirement may be waived for organizations or entities who expend less than \$750,000 in federal funds for the audited year. Awarded allocation of funds are distributed on a reimbursement basis. All agencies except City Departments that are receiving funds must demonstrate the financial capacity to pay any project-related costs, including design, construction and/or operating, for a period of at least three months prior to reimbursement.
- **Completeness Check.** Applications and supporting documentation must be turned in by the respective deadline in order to be considered for funding. All required supporting documentation must be attached to the application in order for it to be considered complete.
- **Compliance with Existing Contracts.** Applicants who are currently receiving HHSP funds and applying for additional funds must be in compliance with all terms of their contract, must not have any outstanding audit findings or monitoring findings as determined by the City or TDHCA, and must remain in good standing throughout the entire program year.
- **Conflict of Interest.** Applicant must divulge if any member of their board is a City employee, so a determination may be made if a conflict exists. Conflict of Interest and all other provisions extend to partners and subcontractors as well.
- **HMIS Participation.** Applicants whose services, program and/or facilities project that will house or primarily serve the homeless population, must fully participate as an entity in the Homeless Management Information System (HMIS) for the full term of the established agreement. “Full participation as an entity” requires that all applicable programs, facilities projects and services operated and/or provided by the entity, regardless of funding source, be compliant with the Standards for Participation of the HMIS Lead Entity. The City will consult with the HMIS Lead Entity to determine compliance with this requirement.
- **Jurisdiction.** All programs, clients and/or improvements must be located within the city limits of El Paso, Texas for programs funded by HHSP.
- **Ordinance 9779.** All facilities receiving funding from the City must be in compliance with Ordinance 9779, Non-Discrimination Against Persons with Disabilities. This means that the facility must be accessible for use by persons with disabilities in terms of employment and service, or have an approved transition plan, before the funding can be approved. As part of this requirement, applicants must submit the completed and signed Assurance of Compliance with Ordinance No. 9779, Accessibility/Letter of Assurance, and submit the completed Guidelines/Self-Evaluation for Community Development and City of El Paso Sub recipients. Refer to Assurance C and Assurance D of this document.
 - The following requirements/allowances pertain to service categories only:
 - Applicant is required to submit Assurance C, Assurance D and the Guidelines/Self-Evaluation.
 - For projects with multiple service locations, an Accessibility/Letter of Assurance must be provided for each site.
- **Timeliness Test.** In order to comply with expenditure requirements enforced by Texas Department of Community Affairs (TDCA), all program year projects should be substantially completed by the end of the program year as stated under Executive Summary of this document.
- **Site Suitability.** Applicant must provide a Zoning Verification Letter provided by City of El Paso's Planning and Inspections Department (915) 212-0104, certifying the appropriateness of the zoning for the proposed project. Projects without the appropriate zoning at the time of application submission will be ineligible for funding.

A Zoning Verification Letter obtained within five (5) years from the start of the upcoming program year may be submitted with a cover letter signed by the Board Chair or Agency Director certifying that there have been no substantial changes in the program activities or the physical structure since the compliance letter was obtained.

- The following Zoning requirements/allowances pertain to service categories only:
 - For projects with multiple service locations, a single letter reflecting all addresses or a letter for each location will be accepted.
 - If the activities are not currently in compliance, the applicant may submit a written workout plan in lieu of the letter. If the applicant is in the process of working out zoning compliance issues, the application will be allowed to advance. However, full compliance must be achieved and a letter of compliance from the City of El Paso’s Planning and Inspections Department must be submitted prior to the City Council public hearing introducing the Draft Annual Action Plan.
 - Projects that have moved physical locations must obtain a zoning compliance letter for the new locations.
 - Projects located in Public Schools or City Parks Department facilities are not required to submit zoning letters.

PERFORMANCE OUTCOMES

DCHD has implemented a performance measurement system to gauge the success of awarded projects. Applicants are required to address in their applications the outcome(s)/benefit(s) that will result from the project after completion. Applicants are required to submit a statement explaining the expected outcome(s) of their projects. Outcomes describe the impact that will result from the project, and are the benefits to individuals, families, organizations and communities derived from construction of the project or participation in a program or service.

PROGRAM APPLICANTS

General. Eligible applicants are agencies currently administering Homelessness Prevention and/or Rapid Rehousing Assistance programs; and who are able to provide case management as part of their Homeless Prevention and/or Rapid Rehousing Assistance programs.

Youth Set-Aside. Eligible applicants are agencies currently administering youth homelessness programs for transitional housing of unaccompanied homeless youth and homeless young adults between the ages of 18 and 24. Eligible applicants must provide case management and/or essential services as part of transitional housing to homeless youth.

TENTATIVE SCHEDULE

Below is the tentative schedule for HHSP:

Description	Date
HHSP NOFA Release Date	Tuesday, April 13, 2021
HHSP Training	Friday, April 16, 2021
Full Application Due Date	Monday, May 3, 2021
Oral Presentations by Applicants to TARP	Thursday, May 27, 2021
Notify Agencies of Funding Recommendation	Friday, June 7, 2021
Present HHSP Funding recommendation to City Council	Monday, June 22, 2021

*Note that dates stated in the *Tentative Schedule* are subject to change. Applicants should contact DCHD staff prior to any trainings, application deadlines or other significant dates for confirmation. Due to COVID-19, meetings, trainings, workshops, public hearings, and other activities regularly conducted in person, may be conducted virtually.

PROGRAM REVIEW + SCORING PROCESS

NOTE: Due to COVID-19, meetings, trainings, workshops, public hearings, and other activities regularly conducted in person, may be conducted virtually.

MANDATORY TRAINING WORKSHOPS

A component of the DCHD planning process is a mandatory training workshop for all potential subrecipients of funds. ***The applicant designee (i.e., personnel writing, preparing and/or overseeing application submittal) of the sub-recipient department or agency must attend the workshop to be considered for funding.***

TECHNICAL ADVISORY REVIEW PANEL

A Technical Advisory Review Panel (TARP) will be established to assist DCHD staff in the HHSP application review process. Below is the breakdown of the TARP:

HHSP TARP
City of El Paso Community + Human Development Staff
Member of another funding entity
Subject Matter Expert (SME) in Homeless Service Provision or Person with Lived Experience

*** Staff will make every effort to establish panels with the composition described, however, substitutions may be made.**

Reviewers will be selected by DCHD staff, with a primary focus on selecting individuals having no relationship to any of the applicant agencies in the service category being reviewed. All reviewers will be required to sign a Conflict of Interest Disclosure affidavit. Upon review of the affidavit, DCHD staff will determine if a conflict of interest exists.

DCHD staff will determine the eligibility of each application. Thereafter, the TARP will perform a detailed review of each eligible proposal. This review will include but is not limited to:

- Past agency performance
- Proper completion of the application
- Community impact and community need
- Program eligibility according to federal regulations

The TARP will score each proposal using the provided scorecard attached to the application. Applications with a preliminary score of 75% or higher will be invited to present to the TARP. Presentations are not mandatory yet highly encouraged and are an opportunity for applicants to address any questions the TARP may have on their application submission.

Presentations will be open to the public, including other applicants, and will be limited to ten minutes. A question and answer period will follow each presentation. No client testimonials will be allowed which includes client, former client, or staff testimonials.

Following the presentations, program recommendations will be developed as follows:

1. All attendees, except for TARP members and selected City staff, will be asked to exit the room after presentations have concluded.
2. The TARP will discuss each proposal. TARP will have the opportunity to revise their preliminary score for each proposal based on the applicant's presentation and TARP discussion.

3. For each proposal, the written scores of TARP members will be averaged to create the agency's final score, which will be used as a platform for the DCHD funding recommendation.
4. Applicants will be notified by email of the DCHD funding recommendation. Full details of the TARP's average score will be made available upon request once all recommendation letters are delivered.
5. Program recommendations will be presented to City Council who has the ultimate authority on project selection.

APPEALS PROCESS

Applicants may submit a valid appeal in writing to DCHD within seven (7) days of receiving notice that their application is not advancing to the next phase of the planning process. Appeals must be grounded on objective-based questions or requirements that pertain to the project evaluation forms.

After receiving an appeal request, DCHD staff will schedule, in a timely manner, a meeting with the applicant to discuss the appeal. If DCHD staff determines that the appeal is valid, corrective action will be made to the project evaluation form(s). If DCHD staff concludes that the appeal is invalid, an applicant can dispute this claim with the DCHD director who will review the validity of the appeal request.

EXIT CONFERENCE

An exit conference will be provided, upon request, to those agencies whose projects are not funded following the final City Council Budget Hearing. The purpose of this conference will be capacity building and a discussion of alternative resources and approaches.

CITY COUNCIL

City Council retains the ultimate authority regarding funding for projects and programs indicated in this document. Recommendations initiated by DCHD Staff and a designated Technical Advisory Review panel are presented in draft form to City Council in a document known as the **HHSP Projected Funding Recommendation**.

IMPLEMENTATION REQUIREMENTS

ELIGIBLE COSTS

- **General**
 - Case management costs include staff salaries related to assessing, arranging, coordinating and monitoring the delivery of services related to finding or maintaining housing. Costs include, but are not limited to, household eligibility determination, counseling, coordinating services and obtaining mainstream benefits for Program Participants, monitoring Program Participant progress, providing safety planning for persons under VAWA, developing a housing and service plan, and entry into HMIS or an HMIS-comparable database.
 - Essential services costs are associated with finding and maintaining stable housing, and include, but are not limited to, costs for:
 1. Out-patient medical services;
 2. Child care;
 3. Education services;
 4. Legal services;

- 5. Mental health services;
 - 6. Local transportation assistance;
 - 7. Drug and alcohol rehabilitation; and
 - 8. Job training.
- Homelessness prevention and homelessness assistance costs that are associated with housing relocation, stabilization and assistance costs.
 - 1. Staff time entering information into HMIS or HMIS-comparable database related to homelessness prevention and homeless assistance is also an eligible cost.
 - 2. Homeless prevention and homelessness assistance costs include, but are not limited to:
 - a. Hotel or motel costs;
 - b. Transitional housing;
 - c. Rental and utility assistance;
 - d. Rental arrears;
 - e. Utility reconnection fees;
 - f. Reasonable and customary security and utility deposits; and
 - g. Moving costs.

- **Youth Set-Aside**

Transitional living activities for Youth-Headed Households designed to provide short-term housing in conjunction with appropriate supportive services designed to foster self-sufficiency.

- Case management costs include staff salaries related to assessing, arranging, coordinating and monitoring the delivery of services related to finding or maintaining housing. Costs include, but are not limited to, household eligibility determination, counseling, coordinating services and obtaining mainstream benefits for Program Participants, monitoring Program Participant progress, providing safety planning for persons under VAWA, developing a housing and service plan, and entry into HMIS or an HMIS-comparable database.
- Operation costs include rent, utilities, supplies and equipment purchases, food pantry supplies, and other related costs necessary to operate an emergency shelter serving individuals experiencing
- Homelessness assistance costs that are associated with housing relocation, stabilization and assistance costs.
 - 1. Staff time entering information into HMIS or HMIS-comparable database related to homelessness prevention and homeless assistance is also an eligible cost.
 - 2. Homeless assistance costs include, but are not limited to:
 - a. Hotel or motel costs;
 - b. Transitional housing;
 - c. Rental and utility assistance;
 - d. Rental arrears;
 - e. Utility reconnection fees;
 - f. Reasonable and customary security and utility deposits; and
 - g. Moving costs.

PROGRAM PARTICIPANT ELIGIBILITY + RECORDKEEPING

Per the Texas Regulation 3762 §7.28, the following requirements pertain to program participant eligibility and recordkeeping:

- A. A Program Participant must satisfy the eligibility requirements by meeting the appropriate definition of Homeless or At-risk of Homelessness in this Chapter, relating to Homelessness Programs, including but not limited to applicable income requirements.
- B. A Program Participant who is Homeless qualifies for emergency shelter, Transitional Living Activities, case management, essential services, and homeless assistance.
- C. A Program Participant who is At-risk of Homelessness qualifies for case management, essential services, and homeless prevention.
- D. The Subrecipient shall establish income limits that do not exceed the moderate income level pursuant to Tex. Gov't Code §2306.152 in its written policies and procedures, and may adopt the income limit calculation method and procedures in TDHCA Handbook 4350 to satisfy this requirement.
- E. **Recertification.** Recertification is required for Program Participants receiving homelessness prevention and homelessness assistance within 12 months of the assistance start date. Subrecipient's written policies may require more frequent recertification. At a minimum, recertification includes that Program Participants receiving homelessness prevention or homelessness assistance:
 - 1. Meet the income eligibility requirements as established by the Subrecipient , if such limits are implemented in the Subrecipient's policies and procedures and required to be reviewed at Recertification; and
 - 2. Lack sufficient resources and support networks necessary to retain housing without assistance.
- F. **Break in Service.** The Subrecipient must document eligibility before providing services after a break in service. A break in service occurs when a previously assisted household has exited the program and is no longer receiving services through Homeless Programs. Upon reentry into HHSP, the Household is required to complete a new intake application and provide updated source documentation, if applicable.
- G. **Program Participant Files.** Subrecipient or their Subgrantees shall maintain Program Participant files, for non-emergency activities providing direct subsidy to or on behalf of a Program Participant that contain the following:
 - 1. An Intake Application, including the signature or legally identifying mark of all adult Household members certifying the validity of information provided, an area to identify the staff person completing the intake application, and the language as required by Tex. Gov't Code §434.212;
 - 2. Certification from the Applicant that they meet the definition of Homeless or At-risk of Homelessness. The certification must include the Program Participant's signature or legally identifying mark;
 - 3. Documentation of income eligibility, if applicable, which may include a DIS if documentation is unobtainable;
 - 4. Documentation of annual recertification, as applicable, including income eligibility determination and verification that the Program Participant lacks sufficient resources and supports networks necessary to retain housing without assistance;
 - 5. Documentation of determination of ineligibility for assistance when assistance is denied. Documentation must include the reason for the determination of ineligibility;
 - 6. Copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by Program Participants;
 - 7. Documentation of the monthly allowance for utilities used to determine compliance with the rent restriction; and
 - 8. Documentation that the Dwelling Unit for Program Participants receiving rental assistance complies with the Housing Standards in this Chapter, relating to Homelessness Programs.

OTHER IMPLEMENTATION REQUIREMENTS

- **Administrative Capacity.** HHSP funds are distributed on a reimbursement basis. All agencies receiving funds must demonstrate administrative and financial capacity to fully operate the proposed project for a period of at least three months prior to reimbursement.
- **Written Standards.** Applicants must certify they have written standards that comply with the requirements HHSP requirements to include order of priority. Additionally, a copy of the written standards of the program will be required within 30 days of submission of application.
- **Budget Modifications.** If an award is granted, the City's prior written approval will be required for any changes exceeding 10% within the consultants' line item.
- **Contact Information.** At least three contact names, phone numbers and email addresses must be provided with each application. The agency's Executive Director must be one of these three contacts. Applicants are responsible for submitting updated contact information throughout the funding year.
- **Eligibility Guidelines.** Applicant must provide direct services to at-risk or homeless individuals and families. Applicant is required to verify each client's eligibility status.
- **Funding Allocation.** The minimum funding for a project will be \$40,000.
- **HMIS Participation.** Applicants for HHSP are required to participate and enter their data in the El Paso Homeless Management Information System (HMIS). Refer to the local requirements section of this document for detailed HMIS participation requirements.
- **Rental Assistance.** Applicants who apply to provide Rental Assistance will be required to conduct inspections of housing units for compliance with Housing Standards, Lead-Based Paint requirement Standards, Fair Market Rent and Rent Reasonableness Standards.
- **Staff hours.** The City will only reimburse applicants for staff hours that are spent on direct services funded by HHSP to eligible clients.

PROGRAM PERFORMANCE

PERFORMANCE GOALS

Applicants must have the capability to track their project outcome(s) over time and report on results if the project/activity is eventually funded. Projects funded will have a contractual obligation to meet projected outcomes. Failure to meet performance outcomes, to include clients served, may result with a hold on reimbursement. Further technical assistance on this subject will be provided to funded agencies.

COMMUNITY PERFORMANCE STANDARDS

Signed into law in 2009, the HEARTH Act requires communities to implement strategies to prevent the loss of housing, help people quickly move out of homelessness and into housing and ensure housing stability (24 CFR Part 578). Therefore, communities must track and report their homeless assistance systems progress towards these outcomes (24 CFR Part 578, items 6 & 7). Performing well on these outcomes requires communities to align their systems to focus on housing based solutions, strengthen their capacity to collect data and information across programs and improve overall system performance.

El Paso Continuum of Care (EPCoC) has developed a Community Performance Plan (CPP) which identifies outcomes to be measured, establishes local benchmarks for achieving these outcomes, proposes improvement strategies for alignment and provides for reporting on poor performers as required by regulations.

Success in achieving performance standards during the annual monitoring period along with other factors, will inform the funding decisions.

COMMUNITY PERFORMANCE PLAN OVERVIEW

The Community Performance Plan (CPP) establishes a process to evaluate and monitor the performance outcomes of all homeless assistance programs. The performance goals must be consistent with the CPP benchmarks established by the Performance and Benchmarks Committee (P&B) and approved by the Continuum of Care (CoC) Board annually. The mission of the P&B committee is to improve community program performance through program monitoring and peer support.

Additionally, homeless assistance programs should be continually improving their performance to meet the CPP benchmarks set by the P&B committee, in alignment with HEARTH initiatives, and approved by the CoC Board.

Community Performance Benchmarks

- Length of Stay or Program Participation
- Exits to Homelessness
- Increase in Earned, Other and Total Income
- Exits to Permanent Housing
- Positive Housing Outcome
- Length of Time between Start Date
- Coordinated Access